

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

MARY T. THOMAS, NEA RICHARD,
JEREMY RUTLEDGE, TRENA WALKER,
DR. BRENDA WILIAMS, and THE
FAMILY UNIT, INC.,

Plaintiffs,

v.

MARCI ANDINO, in her official capacity as
Executive Director of the South Carolina
State Election Commission; JOHN WELLS,
in his official capacity as Chair of the South
Carolina State Election Commission;
CLIFFORD J. EDLER and SCOTT
MOSELEY, in their official capacities as
members of the South Carolina Election
Commission; and HENRY D. McMASTER,
in his official capacity as Governor of South
Carolina,

Defendants.

Case No.: 3:20-cv-01552-JMC

**Application/Affidavit for
Pro Hac Vice Admission**

- (1) Name. Dale Edwin Ho
- (2) Residence. I reside in the following state: New York
If a South Carolina resident, indicate months/years of residence: _____
- (3) Business Address. I am an attorney and practice law under the name of or as a member of the
following firm:

Firm name: American Civil Liberties Union Foundation, Inc.
Mailing address: 125 Broad St. City/State/Zip: New York, NY 10004
Telephone number: (212) 549-2500
Facsimile number: _____
E-mail address: dho@aclu.org
(Application will not be considered without an e-mail address to receive electronic notification.)
- (4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to
comply with the applicable statutes, laws, and rules of the State of South Carolina, with all
applicable federal statutes, laws, and rules, including Local Rules of the United States District

Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.¹

- (5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of New York where I regularly practice law. **Attached is my certificate of good standing.**
- (6) Additional Bar Membership. I have been admitted to practice before the following courts:

By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court	Date Admitted	Good Standing	
State of New York	October 2006	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S. Supreme Court	February 2010	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Eastern District of New York	February 2008	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Northern District of New York	September 2010	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Southern District of New York	September 2010	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
First Circuit Court of Appeals	June 2016	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Second Circuit Court of Appeals	July 2018	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Fourth Circuit Court of Appeals	August 2014	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Fifth Circuit Court of Appeals	March 2013	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sixth Circuit Court of Appeals	August 2014	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Seventh Circuit Court of Appeals	May 2014	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Eighth Circuit Court of Appeals	November 2016	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Ninth Circuit Court of Appeals	May 2010	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Tenth Circuit Court of Appeals	May 2016	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Eleventh Circuit Court of Appeals	May 2017	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
D.C. Circuit Court of Appeals	October 2010	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? ☐ Yes ☒ No
(If “yes,” give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)
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- (8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?
☐ Yes ☒ No
(If “yes,” give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)
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¹This District 1 maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

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- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?

☐ Yes ☒ No

(If “yes,” give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

- (10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?

☐ Yes ☒ No

(If “yes,” give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

- (11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?

☐ Yes ☒ No

(If “yes,” give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Attorney Name:	Susan K. Dunn (Federal Bar #647)
Firm Name:	American Civil Liberties Union of South Carolina
Street Address or Post Office Box:	P.O. Box 20998
City, State, and Zip Code:	Charleston, SC 29413-0998
Telephone Number:	(843) 282-7953
E-Mail Address:	sdunn@aclusc.org

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

Deuel Ross
NAACP Legal Defense & Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10006
(212) 965-2200
dross@naacpldf.org

- (14) Application Fee. I affirm that the application fee of two hundred and fifty dollars (\$250) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.
- (15) Electronic Notification. By submitting this application, I consent to electronic notification.
- (16) Represented Party/Parties. I seek to represent the following party/parties:

NEA RICHARD
JEREMY RUTLEDGE
MARY T. THOMAS
TRENA WALKER
DR. BRENDA WILIAMS
THE FAMILY UNIT, INC.

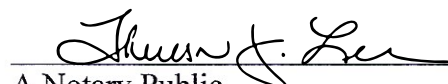
- (17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.



Signature of Applicant

Sworn to and subscribed before me

this 28th day of April, 2020.



A Notary Public
of the State of New York

Pursuant to Executive Order 202.7

My Commission expires: December 23, 2021

THERESA J. LEE Notary Public, State of New York No. 02LE6294551 Qualified in Kings County Commission Expires Dec. 23, 2021
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